

FRENKEL LAMBERT WEISS WEISMAN & GORDON, LLP

80 Main Street, Suite 560

West Orange, NJ 07052

(973) 325-8800

Attorney for Defendant-Secured Creditor, Countrywide Home Loans, Inc.,
servicer for Bank of New York , Secured Creditor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

John T. Kemp, Plaintiff-Debtor

VS.

**Countrywide Home Loans, Inc., servicer for Bank
of New York, Defendant-Secured Creditor.**

Case No.: **08-18700**

CHAPTER 13

Adversary No.: 08-2448 JHW

ANSWER

Defendant-Secured Creditor, Countrywide Home Loans, Inc., servicer for Bank of New York (“Countrywide”) by way of Answer to the Adversary Proceeding Complaint filed by Plaintiff-Debtor, John Kemp says:

1. Countrywide neither admits or denies the allegations set forth in paragraph 1 and puts the Plaintiff to its proofs.
2. Countrywide neither admits or denies the allegation set forth in paragraph 2 and puts the Plaintiff to its proofs.
3. Countrywide admits the allegations set forth in paragraph 3.
4. Countrywide denies the allegations set forth in paragraph 4 and puts the Plaintiff to its proofs.
5. Countrywide admits the allegations set forth in paragraph 5.

6. Countrywide denies the allegations set forth in paragraph 6 and puts the Plaintiff to its proofs.
7. Countrywide denies the allegations set forth in paragraph 7 and puts the Plaintiff to its proofs.

WHEREFORE, Defendant-Secured Creditor, Countrywide hereby demands judgment as follows:

- A. Dismissing the Adversary Proceeding Complaint; and
- B. Such other relief as the Court deems equitable.

SEPARATE DEFENSES

FIRST SEPARATE DEFENSE

Plaintiff-Debtor has failed to set forth a claim upon which relief can be granted.

SECOND SEPARATE DEFENSE

Defendant-Secured Creditor, Countrywide reserves the right to assert additional separate and affirmative defenses throughout the course of this proceeding.

FRENKEL LAMBERT WEISS WEISMAN & GORDON, LLP
Attorneys for Defendant-Secured Creditor

/s/ Dori L. Scovish

By: Dori L. Scovish, Esq.

Dated: December 3, 2008

